

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

In re:	§	Chapter 11
KRISJENN RANCH, LLC,	§	
<i>Debtor</i>	§	Case No. 20-50805
	§	

Case No. 20-50805

**KRISJENN RANCH, LLC and
KRISJENN RANCH, LLC-SERIES
UVALDE RANCH, and KRISJENN
RANCH, LLC-SERIES PIPELINE
ROW as successors in interest to
BLACKDUCK PROPERTIES, LLC,
*Plaintiffs***

V.

**DMA PROPERTIES, INC., and
LONGBRANCH ENERGY, LP,
Defendants**

Adversary No. 20-05027

DMA PROPERTIES, INC,
Cross-Plaintiff/Third Party Plaintiff

V.

**KRISJENN RANCH, LLC,
KRISJENN RANCH, LLC-SERIES
UVALDE RANCH, and KRISJENN
RANCH, LLC-SERIES PIPELINE ROW,
BLACK DUCK PROPERTIES, LLC,
LARRY WRIGHT, and JOHN TERRILL,
*Cross-Defendants/Third-Party
Defendants***

Adversary No. 20-05027

**KRISJENN RANCH, LLC, KRISJENN RANCH, LLC-SERIES UVALDE RANCH, AND
KRISJENN RANCH, LLC-SERIES PIPELINE ROW, AS SUCCESSORS IN INTEREST
TO BLACK DUCK PROPERTIES, LLC’S MOTION REQUESTING EXPEDITED
CONSIDERATION OF OBJECTIONS TO DMA PROPERTIES, INC. AND FRANK
DANIEL MOORE’S AMENDED COUNTERCLAIMS AND THIRD-PARTY CLAIMS**

**DEBTORS HAVE REQUESTED EXPEDITED CONSIDERATION OF THIS
OBJECTION AND HAS REQUESTED THAT A HEARING BE HELD ON THIS
OBJECTION AT THE COURT’S EARLIEST CONVENIENCE. IF THE COURT IN
FACT SETS THIS OBJECTION FOR AN EXPEDITED HEARING, THEN ONLY
ATTENDANCE AT THE HEARING IS NECESSARY TO PRESERVE YOUR RIGHTS**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COME NOW Debtors, Plaintiffs, and Counter-Defendants KrisJenn Ranch, LLC, KrisJenn Ranch, LLC-Series Uvalde Ranch, and KrisJenn Ranch, LLC-Series Pipeline Row (collectively the “Debtors”), and submit this Motion Requesting Expedited Consideration of Debtor’s Objection to DMA Properties, Inc. (“DMA”) and Frank Daniel Moore’s Amended Counterclaims and Third-Party Claims (the “Objection”), and in support thereof respectfully shows the Court as follows:

BACKGROUND

1. The parties were required to “file all amended or supplemental pleadings and shall join additional parties on or before **10/14/20.**” (Dkt. # 69, ¶ 1).
2. DMA and Moore conferred with Debtors asking if they were opposed to DMA and Moore’s amended counterclaims.
3. Debtors asked to see the amended counterclaims before stating whether they objected or not. However, DMA and Moore refused to show the amended counterclaims to Debtors.
4. In the spirit of cooperation, Debtors agreed not to oppose DMA and Moore’s pleadings against Debtors so long as DMA and Moore reciprocated.
5. However, Debtors did not contemplate that DMA and Moore would attempt to join additional parties to the case only 54 days prior to trial.
6. DMA and Moore filed their amended counterclaims with motion for leave of court to file on October 14, 2020. (Dkts. # 100, 100-1, 100-2). The amended counterclaims added David Strolle; Granstaff, Gaedke, & Edgmon, P.C.; and McLeod Oil as additional third-party defendants.

7. Debtors did not join any additional parties in their amended pleading.

8. Debtors would have opposed DMA and Moore's amended counterclaims had they known DMA and Moore intended to add additional parties to the case.

9. Debtors now file this objection to DMA and Moore's request to permissively join additional parties through their amended counterclaims.

RELIEF REQUESTED

10. Debtors request expedited consideration of their Objection to DMA Properties, Inc. and Frank Daniel Moore's Amended Counterclaims and Third-Party Claims.

WHEREFORE, PREMISES CONSIDERED, Debtors respectfully request that the Court grant this request and set the Objection to DMA Properties, Inc. ("DMA") and Frank Daniel Moore's Amended Counterclaims and Third-Party Claims to be heard at the Court's earliest convenience.

Dated: October 29, 2020

Respectfully submitted,

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By: /s/ John Muller

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ATTORNEYS FOR DEBTORS

CERTIFICATE OF CONFERENCE

I hereby certify that on October 28, 2020 I conferred with counsel for DMA Properties, Inc. and Frank Daniel Moore about the relief requested in this motion. Upon such conference, counsel has indicated that they are opposed to the relief requested in the above motion.

/s/ John Muller
C. John Muller IV

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record by way of e-service through the CM/ECF system by notice of electronic filing or via email on the 29th day of October 2020:

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